REMARKS

I.   Introduction

Applicants submit the present paper to request that the Examiner reconsider the rejections set forth in the *Final Office Action* mailed on December 28, 2005. For the reasons discussed herein, Applicants respectfully submit that the pending rejections should be withdrawn, and the present application passed to issuance.

As the rejections in the *Final Office Action* appear to be identical to the rejections set forth in the previous *Office Action*, Applicants will not repeat here Applicants' full grounds for believing that the rejections should be withdrawn. Instead, Applicants incorporate by reference Applicants' previous response, mailed September 27, 2005, as if it were set forth fully herein. The purpose of the present *Request for Reconsideration* is to respond to the first two arguments set forth in the *Response to Arguments* section of the *Final Office Action*. While Applicants dispute each of the remaining arguments set forth in the *Response to Arguments* section, Applicants' position with respect to these arguments is sufficiently clear in Applicants' prior response such that additional arguments are not necessary at this time.

II.   Response to the Arguments Set Forth in the Final Office Action

A.   Thomas Fails to Teach Storing a Record of a User Request

The *Response to Arguments* section of the *Final Office Action* first states that U.S. Patent No. 6,128,663 to Thomas ("Thomas") teaches "storing a record of the user request" as recited in Claim 1. (*Final Office Action* at 9-10). In particular, the *Final Office Action* states that Col. 4, lines 23-53 of Thomas teaches "**storing a record of a user** who requests a web page within a remote server by registration", and that the "record includes user demographic information and demographic identifier so that the demographic identifier is retrieved and appended to the user request of a web page." (*Final Office Action* at 10) (emphasis added). Applicants respectfully submit that Thomas does not teach what is suggested in the *Response to Arguments* section of the *Final Office Action*.

As the language of the preamble and first clause of Claim 1 make clear, in Claim 1 the recitation of "storing a record of the user request" refers to **storing a record of a user's request for a web page**. (*See* Claim 1, reciting "a user who requests a Web page from a Web server, wherein the user makes the Web page request . . . storing a record of the user request . . .). The rejection of Claim 1, however, is based on the Examiner's argument that

Thomas teaches "storing a record **of a user** who requests the web page." (*Final Office Action* at 10). Storing a record **of a user** (with associated demographic information regarding the user) is very different than storing a **user's request for a specific web page**, and the Examiner's argument that Thomas discloses "storing a record of a user" is insufficient to support a rejection of Claim 1.

In this regard, Applicants note that the portion of Thomas cited in the Final Office Action states:

> [T]he remote server encourages the user to login to or register with one of its web pages so that the remote server can identify the user against its database of users. Once the user is identified, the remote server determines or retrieves an appropriate demographic identifier for the user. . . . [O]nce the appropriate demographic identifier is known, it can be transmitted between remote servers and/or between a local browser and a remote server in various ways. One way is to embed the demographic identifier into the pages delivered by the remote server to the local browser.

(Thomas at Col. 4, lines 26-43). Thus, the cited portion of Thomas states that (1) a user can login to/register with a web page of the remote server, (2) that the remote server determines/retrieves a demographic identifier for the user and (3) that the demographic identifier can be transmitted to another server/browser by embedding it in a web page that is being delivered. **Nowhere does the cited portion of Thomas teach or suggest that a record of the user's request for a web page is stored**. The fact that Thomas states at Col. 4, lines 49-51 that the demographic identifier may be appended to a web page that is delivered to the user does not in any way teach or suggest that a record of the user's request for the web page is stored anywhere. Accordingly, it is clear that Thomas does not teach or suggest "storing a record of [a] user['s] request [for a web page]" and, as such, the pending rejections should be withdrawn. In the event the rejections are not withdrawn, Applicants respectfully request that the Examiner specifically identify the exact passages from Thomas that allegedly teach that a record of the request for a web page is stored, specifically identifying which web page the record allegedly refers to and the location within the server where the record allegedly is stored.

B. Thomas Fails to Teach Appending Content Identifiers to Stored Records of User Requests

The *Response to Arguments* section of the *Final Office Action* next argues that Thomas teaches the "appending the stored record of the user request with the unique

identifier associated with the content object included within the generated Web page" recitation of Claim 1. In particular, the *Final Office Action* states that Col. 4, lines 49-51 and Col. 5, line 15 through Col. 6, line 40 of Thomas teaches (1) that a user requests a second HTML web page 104 via a hyperlink button 108 on a first HTML web page, (2) that a record of the user who requests the web page is stored along with demographic information on the user, (3) the user clicks on the hyperlink 110 to **send the user's request** for the first HTML web page to the remote server with the demographic information appended thereto so that the first server can display the requested web page to the user with an appropriate advertising banner that is selected based on the demographic information. *(Final Office Action* at 10). The cited portions of Thomas fail to teach or disclose the "appending" recitation of Claim 1 for at least two independent reasons.

First, what Claim 1 states is that a "unique identifier" is appended to the stored record of a user's request for a web page. The rejection points to the demographic information as the appended information. *(See Final Office Action* at 10, stating "appending the demographic identifier to the request"). However, in Thomas, the demographic information is appended to the actual request for a web page that is sent from a local browser to a remote server. An **actual request** for a web page is very different from a **stored record** of a user's request, which is what Claim 1 recites the unique identifier is appended to. Thus, as Thomas fails to teach or disclose appending a unique identifier to a stored record of a user's request, the rejection of Claim 1 should be withdrawn.
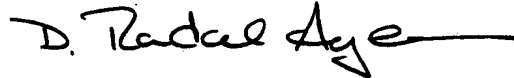
Second, the demographic information of Thomas does not comprise a "unique identifier associated with the content object included within the generated Web page" as recited in Claim 1. Instead, the demographic information is information such as a particular user's interests, preferences, hobbies, preferred greeting name, etc. *(See* Thomas at Col. 4, lines 16-20). While Applicants will not address here whether or not this demographic information could be considered to comprise a "unique identifier", it is unquestionably the case that the demographic information is not a "unique identifier associated with the content object included within the generated Web page." Instead, the demographic information is associated with a particular user. There is no teaching in Thomas that particular demographic information will always result in the selection of the same content object or is in some other way associated with a particular content object such that it comprises a unique identifier. This provides a second, independent basis for withdrawal of the pending rejections.

In the event that the rejections are not withdrawn in response to the present *Request for Reconsideration,* Applicants respectfully request that the Examiner explain (1) the basis for arguing that the demographic information is appended to a **stored record of a user's request** for a web page as opposed to the actual request that is sent to the server and (2) the basis for claiming that the demographic information comprises a unique identifier that is associated with a particular content object.

III. Conclusion

In light of the above discussion, Applicants respectfully submit that the pending claims are in condition for allowance, which is respectfully requested.
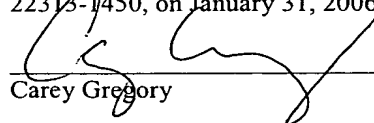
Respectfully submitted,

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